

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)
v.)
Plaintiffs,)
GOOGLE LLC,)
Defendant.)
No. 1:23-cv-00108-LMB-JFA

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C), the Protective Order (ECF No. 98 and Modified Protective Order, ECF No. 203) and the Court’s order on an extension of time to respond to motions to seal exhibits, ECF No. 621, Plaintiffs, through their undersigned counsel, hereby respectfully move this Court to seal certain portions of Plaintiffs’ Memorandum of Law in Opposition to Google LLC’s Motion to Exclude the Testimony of Dr. Timothy Simcoe as well as certain exhibits attached to the same motion. The redacted portions contain material that Google and third parties have designated as highly confidential or confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: May 17, 2024

Respectfully submitted,

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